

**Before The
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	
To Ensure Compatibility with Enhanced)	
911 Emergency Calling Systems)	CC Docket No. 94-102
)	
E911 Requirements for IP-Enabled)	
Service Providers)	WC Docket No. 05-196
)	
Wireless E911 Location Accuracy)	
Requirements)	PS Docket No. 07-114
)	
Framework for Next Generation)	
911 Deployment)	PS Docket No. 10-255

**REPLY OF
TELECOMMUNICATION SYSTEMS, INC.**

**Kim Robert Scovill
Senior Director Government Affairs
TeleCommunication Systems, Inc.
275 West Street – Suite 400
Annapolis, MD 21401**

**H. Russell Frisby, Jr.
Counsel
Stinson Morrison Hecker LLP
1775 Pennsylvania Avenue, NW
Suite 800
Washington, DC 20006**

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**REPLY
OF
TELECOMMUNICATION SYSTEMS, INC.**

TeleCommunication Systems, Inc. ("TCS") hereby submits its reply in response to various Comments filed under the Public Notice ("Notice") released by the Federal Communications Commission ("Commission" or "FCC") in the above-referenced proceeding.¹

SUMMARY

Commenters in this Notice generally agree that a National 9-1-1 MLTS (multi-line telephone systems) standard is technically feasible, in the public interest, and overdue for implementation. There are also strong arguments in favor of implementation via the FCC's Part 68 rules. TCS concurs with both of these positions.

A) A National 9-1-1 MLTS Standard Is Both Feasible and Overdue

TCS agrees with the majority of comments to this Notice regarding the need for, content of, and timing of 9-1-1 MLTS equipment standards:

- 1) E9-1-1 MLTS is relevant to a fully functioning modern communications network;
- 2) No cost-benefit analysis supports delaying Commission action addressing E9-1-1 MLTS;
- 3) The NENA Model Legislation² provides a good starting point for development of such a nationwide approach;

¹Public Notice DA 12-798, *Public Safety And Homeland Security Bureau Seeks Comment On Multi-Line Telephone Systems Pursuant To The Next Generation 911 Advancement Act Of 2012*, CC Docket No. 94-102, WC Docket No. 05-196, PS Docket No. 07-114, and PS Docket No. 10-255, May 21, 2012 ("Notice").

² NENA, *Technical Requirements Document on Model Legislation, E9-1-1 for Multi-Line Telephone Systems*, NENA 06-750 (Ver. 3 Feb. 5, 2011), available at http://www.nena.org/general/custom.asp?page=MLTS_Legislation

- 4) To the extent MLTS standards are developed, it is logical that they should be forward looking solutions focused on the future of voice communications (i.e., IP based systems);
- 5) TCS supports the NENA recommendation that the Commission set an initial compliance deadline five years from the date on which an Order is issued implementing E9-1-1 MLTS;
- 6) MLTS location accuracy would require further study before inclusion in any mandate; and
- 7) The Administrative Council for Terminal Attachments (ACTA) recommends, and TCS agrees, that the Commission take the opportunity to protect the PSTN by clarifying that all devices, including VoIP, that connect or potentially can connect to the PSTN, and private line services provided over wireline facilities that are owned by providers of wireline telecommunications, must be compliant with Part 68 rules and the ACTA-adopted technical criteria, and must be listed in the ACTA's Part 68 database of approved terminal equipment.³

B) A National 9-1-1 MLTS Standard Can Be Achieved Via The FCC's Part 68 Rules

While the need for 9-1-1 MLTS is universal, commenters noted that only 18 states have enacted legislation, and the requirements contained therein are inconsistent at best. A consistent national mandate is required. TCS agrees with the general proposition repeated by many in this docket that the FCC's Part 68 certification rules be modified to include 9-1-1 MLTS capability in all future business telephone systems. Because further refinement and standardization may be

³ <http://www.part68.org/>

required for inclusion of 9-1-1 MLTS standards in Part 68, the Commission should proceed via the appropriate notice and rulemaking process.

Conclusion

TCS offers this Reply regarding the issues raised in Comments filed in response to the Commission's questions in this Public Notice, and encourages the Commission to consider implementation of MLTS as outlined in this Reply.

Respectfully submitted,

Kim Robert Scovill, Esq.
Senior Director Government Affairs
TeleCommunication Systems, Inc.
275 West Street – Suite 400
Annapolis, MD 21401

/s/ H. Russell Frisby, Jr.
H. Russell Frisby, Jr.
Counsel
Stinson Morrison Hecker LLP
1775 Pennsylvania Avenue, NW
Suite 800
Washington, DC 20006

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